Case	5:23-cv-00515-HDV-JPR	Document 103 #:1553	Filed 02/03/25	Page 1 of 13 Page ID
		77.1000		
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9	Fax: (619) 645-2581 E-mail: David.Klehm			
10	Attorneys for Defendant acting by and through to	t State of Californ	ia, hwav	
11	Patrol (erroneously sue and Michael Bell	d as "State of Cal	lifornia")	
12				
13	IN TH	IE UNITED STA	TES DISTRIC	T COURT
14	FOR TH	E CENTRAL DI	STRICT OF CA	ALIFORNIA
15				
16				
17	EDGAR SOLIS,		5:23-cv-0051	5_HDV_IPR
18	EDGAR SOLIS,	Plaintiff,		TS' FOURTH
19	v.	Tiamiiii,	AMENDED	WITNESS LIST
20	v.		Date: Time:	February 18, 2025 9:00 a.m.
21	COUNTY OF RIVERS OF CALIFORNIA; SA WALTERMIRE; and	SIDE; STATE	Courtroom:	10D
22	WALTERMIRE; and inclusive,	DOES 1-10,	Judge:	The Honorable Hernan D. Vera
	inclusive,	Defendants.	Trial Data	
23		Defendants.	Trial Date: Action Filed:	February 18, 2025 2/02/2023
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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants State of California, acting by and through the California Highway Patrol, and Michael Bell hereby serve the following list of witnesses who may be called during trial. Defendants reserve the right to supplement or amend this list.

6 7	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
9	Michael Bell, Defendant, CHP Officer	Officer Bell is the defendant and will testify about his interactions with	1.25		
10 11		Plaintiff, training and experience with the CHP.			
12	Patrick Sobaszek,	Detective Sobaszek will testify about his	45 mins	45 mins	
13	Detective, Hemet Police Department	interactions with and observations of Plaintiff and incident,			
14 15		police tactics used, training and experience as a law			
16		enforcement officer, including in SWAT			
17		and on the Gang Task Force. Sobaszek is unique in that he was			
18 19		an eyewitness to various portions of the incident and heard and			
20		observed events, including from			
21		different angles or perspectives, that others may not have			
22	~ 1	similarly observed.			
23	Salvador Waltermire, Deputy,	Deputy Waltermire will testify about his interactions with and	45 mins	30 mins	
24	Riverside County	observations of Plaintiff and incident,			
25 26	Sheriff's Department	including the third volley of shots, police			
27		tactics used, and his training and experience as a law			
28		enforcement officer.			

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1	Witness's Name* Title	Summary of Testimony/Why	Direct Exam	Cross Exam	Dates of Testimony
2	Name*, Title, Affiliation (If Relevant)	Testimony is Unique	(Hours)	(Hours)	1 Commony
3	,	Waltermire is unique in that he was an			
5		eyewitness to various portions of the			
6		incident and heard and observed events,			
7		including from different angles or perspectives, that			
8		others may not have similarly observed.			
9	Arthur Paez, Sergeant,	Sergeant Paez will testify about his	30-45 min.	45 min.	
10	Hemet Police Department	knowledge of Plaintiff,			
11		communications with the Gang Task Force			
12		concerning Plaintiff, and observations of Plaintiff and the			
13		incident, including the			
14		third volley of shots, police tactics used, as well as experience as			
15		a law enforcement officer. Paez is unique			
16		in that he was an eyewitness to various			
17 18		portions of the incident and heard and			
19		observed events, including from			
20		different angles or perspectives, that others may not have			
21	M. Vargas,	similarly observed. Stationed at San	45 minutes	45 min	
22	Lieutenant, CHP San	Gorgonio Pass Area Office, Field	15 1111114103		
23	Gorgonio Pass	Operations. Involved in post-shooting			
24		investigation and knowledge of			
25		Defendant Bell's tactical training.			
26	D. Harris, Sergeant, CHP	Stationed at San Gorgonio Pass Area	45 minutes	45 min	
27	San Gorgonio Pass	Office, Field Sergeant and knowledge of			
28		Defendant Bell's			1

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1	Witness's	Summary of Testimony/Why	Direct Exam	Cross Exam	Dates of Testimony
2	Name*, Title, Affiliation (If Relevant)	Testimony is Unique	(Hours)	(Hours)	1 csumony
3	,	tactical training.			
4	C. Hamilton, Lieutenant,	CHP Critical Incident Investigation Team,	1 hour	1 hr	
5	CHP Border Division CIIT	Leader. Involved in CHP critical incident investigation of the			
6		incident involving use of force on Plaintiff.			
7	J. Kawanaka,	CHP Critical Incident	45 minutes	45 min	
8	Sergeant, CHP Border Division CIIT	Investigation Team, Lead Administrative Investigator. Involved			
9	Division Cirr	in CHP critical incident investigation			
10		of the incident involving use of force on Plaintiff.			
		on Plaintiff.			
12	· · ·	D' 11 G	1.5	1.5	
13	Daniel Moody, Detective	Riverside County Sheriff Department involved in the	45 minutes	45 min	
14	Detective	subsequent scene			
15		control or incident investigation and			
16		plaintiff's blood sample.			
17	J. Manjarrez, Detective	Riverside County Sheriff Department	30 minutes	30 min	
18		officials. Collected white bag of powdery			
19		substance from plaintiff's car			
20		suspected fentanyl and blood sample.			
21	A. Ditfurth, Deputy	Riverside County Sheriff Department	30 minutes.	30 min	
22		official involved in the incident			
23		investigation. Surveillance video			
24		from 642 Taschner Drive and plaintiff's			
25		firearm forensic analysis.			
26	Daniel Cline, Deputy	Riverside County Sheriff Department	20 minutes	20 min	
27		official involved in the incident			
28		investigation,		<u> </u>	

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1 2	Witness's Name*, Title, Affiliation (If	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	Relevant)	, T	(110u15)	(110u13)	
3 4		obtained pictures, DNA swab, and Scanner data.			
5	D. Sandoval, Investigator	Riverside County official involved in	20 min.	20 min.	
6	-	the incident investigation, involved in area			
7		canvass and investigation.			
8	S. Anderson,	Riverside County	20 min.	20 min.	
9	Investigator	official involved in the incident investigation,			
10 11		involved in area canvass and			
	Jennifer	investigation. Riverside County	20 minutes	20 min	
12	Jernegan, Lead Forensic	Sheriff Department official involved in	20 minutes	20 111111	
13	Evidence	the incident			
14	Supervisor Yesika	investigation. Riverside County	40 minutes	40 min	
15	Alvarado, Forensic	Sheriff Department official involved in			
16	Evidence Technician	the incident investigation.			
17 18		Captured pictures of scene, bullet holes and charted plaintiff's			
		firearm.			
19					
20	A. Carey, Forensic	Riverside County Sheriff Department	20 minutes	20 min	
21	Services Bureau	official involved in the incident			
22	Technician	investigation. Obtained pictures of			
23		scene and plaintiff in hospital and first aid			
24	Venderfees,	supplies and clothing. Riverside County	20 minutes	20 min	
25	Forensic Services	Sheriff Department official involved in			
26	Bureau Technician	the incident investigation.			
27		Obtained pictures of pursuit termination at			
28		632 Taschner Drive			

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1	Witness's Name*, Title,	Summary of Testimony/Why	Direct Exam	Cross Exam	Dates of Testimony
2	Name*, Title, Affiliation (If Relevant)	Testimony is Unique	(Hours)	(Hours)	2 Country
3 4		and point of rest of plaintiff's car and carport damage.			
5	Monique Torres,	Riverside County Sheriff Department	20 min	20 min	
6	Forensic Services Bureau	official involved in the incident investigation. Went to			
7	Technician	scene to collect and chart evidence;			
8	Ciones V 11	prepared a scaled 3D diagram.	20 main	20 min	
10	Sienna Knoll, Forensic Services	Riverside County Sheriff Department official involved in	20 min.	20 min.	
11	Bureau Technician	the incident investigation.			
12		Photographed and processed the Mustang.			
13 14	Esteban Carranza,	Riverside County District Attorney's	30 minutes	30 min	
15	Investigator	Investigator involved in the criminal investigation of the			
16 17	J. Gonzalez, Lieutenant	incident. Hemet Police Department Officer	30 minutes	30 min	
18		responded to the area where Plaintiff fled and where shots were			
19		fired and involved in the subsequent scene			
20	D Modday	control or incident investigation.	20 minutes	20 min	
21	D. Maddox, Sergeant	Hemet Police Department Officer responded to the area	30 minutes	30 min	
22 23		responded to the area where Plaintiff fled and where shots were			
24		fired and involved in the subsequent			
25	G. Gomez, Detective	incident investigation. Hemet Police Department Officer	20 minutes	20 min	
26		involved in the incident investigation.			
2728	Amy Lim	Riverside University Health System hospital laboratory	15 minutes	15 minutes	

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1	Witness's	Summary of Testimony/Why	Direct Exam	Cross Exam	Dates of Testimony
2	Name*, Title, Affiliation (If Relevant)	Testimony is Unique	(Hours)	(Hours)	1 estimony
3 4	,	sample collection of blood and urine from Plaintiff at hospital on			
5	RN Joeallen*	date of incident. Riverside University	15 min.	15 min.	
6		Health System concerning collection of blood and/or urine			
7		samples from Plaintiff at hospital on date of			
8	Valanmiala	incident.	15	15	
9	Valenzuela, Paola RN*	Riverside University Health System concerning collection of blood and/or urine	15 min.	15 min.	
11		samples from Plaintiff at hospital on date of			
12	Otteson, Lisa	incident. Riverside University	15 min.	15 min.	
13	Christine RN*	Health System concerning collection	13 11111.		
14		of blood and/or urine samples from Plaintiff			
15		at hospital on date of incident.			
16	McGuire, Bailey RN*	Riverside University Health System	15 min.	15 min.	
17		of blood and/or urine			
18		samples from Plaintiff at hospital on date of incident.			
19	Wilson, Stephen*	Riverside University Health System	15 min.	15 min.	
20	Stephen	concerning collection of blood and/or urine			
21		samples from Plaintiff at hospital on date of			
22	Dichard Davis	incident.	15 min	15	
23	Richard Doria, Nurse*	Riverside University Health System	15 min.	15 min.	
24		hospital nurse regarding sample collection of blood			
25		and urine from			
26		plaintiff at hospital on date of incident.	1.5	1.5	
2728	Rogers, Shana Lee NP*	Riverside University Health System hospital nurse	15 min.	15 min.	

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1	Witness's	Summary of	Direct	Cross	Dates of
2	Name*, Title, Affiliation (If Relevant)	Testimony/Why Testimony is Unique	Exam (Hours)	Exam (Hours)	Testimony
3	11010 (11111)	regarding sample			
4		collection of blood and urine from			
5		plaintiff at hospital on date of incident.			
6	Wallace, Bradley MD*	Riverside University Health System	15 min.	15 min.	
7		hospital provider regarding blood			
8		samples, and urine			
		sample drug abuse screen of plaintiff at			
9		hospital on date of incident.			
10	Gonzalez, Reyna Teresa	Riverside University Health System	15 min.	15 min.	
11	MD*	hospital provider			
12		regarding blood samples, and urine			
13		sample drug abuse screen of plaintiff at			
14		hospital on date of incident.			
15	Downing, Stephanie Rae,	Riverside University Health System	20 mins.	20 mins.	
16	MD*	hospital provider regarding urine			
17		sample drug abuse screen of plaintiff at			
18		hospital on date of incident.			
19	Albini, Paul	Riverside University	20 mins.	20 mins.	
20	Thomas, MD*	Health System hospital provider			
21		regarding blood samples of plaintiff at			
		hospital on date of incident.			
22	Custodian of Records*	Riverside University Health System	20 mins.	20 mins.	
23	Records	hospital witness			
24		concerning the urine sample and blood			
25		samples collected from plaintiff on date			
26	Kristen	of incident. Bio-Tox Laboratories	30 minutes	30 min	
27	Steward, M.S.,	Personnel involved in	30 minutes	JOHHI	
28	D-ABFŤ-FT	the testing and analysis of blood			

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Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
,	obtained from Plaintiff.			
Ola Bawardi, M.S.	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood obtained from Plaintiff.	30 minutes	30 minutes	
Greg Meyer, Captain (Ret.)	Police Practices Expert will explain POST standards from basic law enforcement training and use of force tactics applicable to facts of this case.	2 hours	1 hr, 15 min – 1 hr 30 min	
Parris Ward, Forensic Video Analyst	Forensic video/audio analyst. Will testify regarding his assessment of BWC footage and security cameras near the shooting location and information that can be derived in relation to incident shooting.	1 hour	45 min	
Ronald Kvitne, M.D.	Board certified orthopedic surgeon medical expert will testify about his review and analysis of plaintiff's medical records as they pertain to Plaintiff's injuries including further treatment.	45 minutes	30-40 min	
Michael Ritter, M.D.	Emergency Medicine expert will testify about his review and analysis of plaintiff's Toxicology drug results positive for methamphetamine and PCP and other medical records pertaining to Plaintiff's injuries.	1 hour	45 min	
Leslie Martinez	Resident of the property where the	20 minutes	20 min	

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Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	incident occurred who heard yelling and gunshots.			
Marlene Sue Biggs	Resident who observed 2-3 officers chase a male adult and heard gunshots	20 minutes	20 min	
Jose Jesus Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Ana Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Liliana Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Pearo Rodriguez	Resident who provided surveillance video from camera mounted to front of residence	20 minutes	20 min	
Florina Maria Mandujano	Resident who provided surveillance video from camera mounted to front of residence	20 minutes	20 min	
Thomas Jordan	Resident who provided surveillance video from camera	15 minutes	15 min	

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Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	mounted to front of residence			
Nidia Santana	Resident who provided surveillance video from camera mounted to front of residence	15 minutes	15 min	
Richard Contla	Resident who heard a crashing sound and observed the suspect jump over an east wall. Then heard one of the officers yell, "He's got a gun" followed by numerous gunshots and shouting. Mr. Contla recognized suspect, having seen him in the area before the incident.	30 minutes	30 min	
Kathy Lynn Cassel	Resident of the area where the suspect collided with the Kia Sorrento causing damage to the Kia, support post for the parking stall awning and block wall	20 minutes	20 min	
Jaden Schlig	Resident and eyewitness to portions of incident from 633 Hillmer Drive.	20 min	20 min	

Case	5:23-cv-00515-HDV-JPR	Document 103 ID #:1564	Filed 02/03/25 F	Page 12 of 13	Page
1	Dated: February 3, 2023	5	Respectfully su	ubmitted,	
2			ROB BONTA Attorney Gene	eral of Californ	nia
3			Attorney Gene DONNA M. DEA Supervising Do	AN eputy Attorney	v General
4			Supervising De DAVID KLEHM Deputy Attorne TAMMY KIM	ey General	, 0 02202002
5			TAMMY KIM Deputy Attorn	ey General	
6			/s/ Tammy Kim	<u>1</u>	
7			Attorneys for L	Defendants Sta	te of
8 9			Attorneys for L California, act California Hig (erroneously sa California") a	ing by ana thr hway Patrol ued as "State	of
10			California") ai	nd Michael Be	ell
11	*Indicates that witness will be cal	led only if the need arise	es.		
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CERTIFICATE OF SERVICE

Case Name:	Edgar Solis v. County of Riverside, et al.	No.	5:23-cv-00515-HDV-JPR
•	fy that on <u>February 3, 2025</u> , I electron court by using the CM/ECF system	•	I the following documents with the
	DEFENDANTS' FOURTH	AMENDED	WITNESS LIST
•	all participants in the case are regisl by the CM/ECF system.	tered CM/EC	F users and that service will be
of America th	er penalty of perjury under the laws ne foregoing is true and correct and an Diego, California.		
	C. Henson Declarant		Signature

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